

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DAVID WADE,	:	Case No. 2:21-cv-00305
	:	
Plaintiff,	:	Judge Edmund A. Sargus, Jr.
	:	Magistrate Judge Chelsey Vascura
v.	:	
	:	
FRANKLIN COUNTY, OHIO, <i>et al.</i> ,	:	
	:	
Defendants.	:	

**STIPULATED MOTION FOR EXTENSION TO DEADLINES
FOR EXPERT REPORTS, DISCOVERY, DISPOSITIVE MOTIONS, AND DEADLINES SET
FORTH IN ECF NO. 26**

Pursuant to S.D. Ohio Civ. R. 7.3, all parties hereby stipulate and agree to a one-hundred twelve (112) day extension to the deadline for primary expert reports, an eighty (80) day extension to the deadline for rebuttal expert reports, and a seventy-six (76) day extension to the discovery deadline. The parties additionally stipulate to a sixty-three (63) day extension to the dispositive motion deadline. Furthermore, the parties stipulate to an extension of all deadlines set forth in ECF No. 26, including but not limited to the deadlines for the parties' confidential assessments for settlement conference; the date of the settlement conference; the deadline for statements of witnesses, designations of deposition portions, and exhibit lists; the deadline for stipulations, motions *in limine*, agreed jury instructions, and proposed case-specific jury instructions; the deadline for memoranda in opposition to motions *in limine* and objections to case-specific jury instructions; the deadline for final pretrial order and general areas for voir dire questions; the final pretrial conference date; and the date for trial, voir dire, opening statements, and presentation of evidence. The parties hereby stipulate to an extension of each of the aforementioned deadlines set

forth in ECF No. 26, with new dates to be determined by the Court. The parties therefore propose the following revised deadlines:

Expert Reports:	August 15, 2022
Rebuttal Reports:	September 5, 2022
Discovery:	October 10, 2022
Dispositive Motions:	November 18, 2022

All other deadlines set forth in ECF No. 26: To be determined by the Court.

The witnesses who must provide an expert report are as set forth in Fed. R. Civ. P. 26(a)(2)(B) and (C). The scope of Rebuttal Reports, but not the timing (set above), will be limited to that described within Fed. R. Civ. P. 26(a)(2)(D)(ii).

Respectfully Submitted,

/s/ John A. Zervas

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*Counsel for Defendants Nova Security Group, Inc.
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CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2022, I filed the foregoing document electronically using the Court's CM/ECF system, which will send a notice of electronic filing to all counsel of record in this action.

/s/ Clem C. Trischler
Clem C. Trischler (*pro hac vice*)